

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	

COMMENTS OF NETNUMBER, INC.

NetNumber, Inc. (“NetNumber”), by its undersigned counsel, hereby submits these comments to the Federal Communications Commission (“FCC” or “Commission”)¹ responding to the Petition for Reconsideration filed by the Competitive Carriers Association, CTIA, and USTelecom-The Broadband Association (“Associations”)² concerning the FCC’s December 13, 2018 Second Report and Order establishing a reassigned number database (“RND”) and describing the selection process for an RND Administrator (“*RND Order*”).³ The Commission’s presupposition that operational and cost efficiencies will result from merging the

¹ WC Docket No. 11-42, Public Notice, DA 17-1185 (WCB rel. Dec. 7, 2017).

² Petition for Reconsideration of the Competitive Carriers Association, CTIA, and USTelecom-The Broadband Association, CG Docket No. 17-59 (filed Apr. 25, 2019) (“Association Petition”). With respect to the petition filed by the Professional Association for Customer Engagement, NetNumber reserves comment at this time. Generally, as a database provider, NetNumber could build a reassigned number database according to any specifications that the FCC or other entity may determine to be appropriate or desired; if there is not a need to check toll-free numbers or business numbers (assuming they can be identified accurately), a database could be designed without such numbers. *See* Petition for Reconsideration of the Professional Association for Customer Engagement, CG Docket No. 17-59 (filed Apr. 25, 2019).

³ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Dkt. 17-59, Second Report and Order, FCC 18-177 (Dec. 13, 2018) (“*RND Order*”).

RND Administrator with the North American Numbering Plan Administrator (“NANPA”) and Pooling Administrator (“PA”) appears to be premature. While in theory all three functions could be provided by the same vendor, there is no unique capability that a vendor of the NANPA or PA functions would have compared to a stand-alone vendor of RND services. Rather than binding the Commission to a course of action now, and potentially discouraging bids from companies that are well-suited to serve as the RND Administrator, the Commission should preserve flexibility to consider the RND Administrator function separate from the NANPA and PA functions. It should ask the North American Numbering Council (“NANC”) for its opinion on this issue before finalizing its course of action. Therefore, NetNumber supports the reconsideration of the statements made in paragraph 34 of the *RND Order*.

NetNumber is a leading provider of signaling, routing, and database services to the global communications industry, including mobile operators, fixed carriers, and intermediary providers. NetNumber, through its innovative TITAN platform, offers providers subscriber data management applications, such as a global number portability, toll-free routing, calling-name (CNAM) lookup, and least-cost routing functions. TITAN is the industry’s most robust Centralized Signaling and Routing Control (“CSRC”) platform, providing a common, virtualized infrastructure for all signaling control, routing policy enforcement, and subscriber database services in the network. NetNumber prides itself on offering its customers a cost effective and easily scalable product that can serve any customer’s needs.

NetNumber is well-positioned to serve as the RND Administrator or to support the functions required of the RND Administrator. NetNumber can leverage its leading position in core-network signaling control technology in the North American market and in telecom data

collection, distribution, and query services to administer an RND. NetNumber has existing infrastructure available to support immediate deployment of the RND as envisioned by the Commission in the *RND Order*.

NetNumber shares the concerns expressed by the Associations and by iconectiv,⁴ however, about the Commission's assumption that it may be able to achieve operational efficiencies and cost-savings by combining RND administration with the current NANPA and PA functions.⁵ The operational needs for the RND are distinct from NANPA/PA administration. As the Commission acknowledged in the *RND Order*, the RND Administrator will need to be able to process approximately 35 million individual number disconnects and millions of reassignments each year.⁶ The RND Administrator will also need to provide real-time processing of batch and individual database queries made by *thousands* of entities of various sizes and levels of sophistication, including telemarketers, collection agencies, and other enterprises.⁷ These are functions that many telecommunications databases already need to accommodate, albeit with varying degrees of magnitude relating both to the rate of change in the underlying data and the number of queries made to it. NetNumber already provides such capabilities with its telecommunications products.

⁴ iconectiv *Ex Parte*, CG Dkt. 17-59 (Mar. 29, 2019).

⁵ *RND Order*, ¶ 34.

⁶ *Id.*, ¶ 6.

⁷ *Id.*, ¶ 27.

Conversely, as of 2018, the current NANPA/PA serves fewer than 1,200 entities,⁸ and it processed only 12,000 Numbering Resource Utilization/Forecast reports from these entities that year.⁹ For these entities, the NANPA/PA issued only six new Numbering Plan Area codes¹⁰ and processed fewer than 10,000 central office code assignments,¹¹ neither of which required completion in real-time. Additionally, whereas the current NANPA/PA recovers costs for its “more generalized number administration” from all providers, the RND Administrator presently is expected to coordinate with the Billing & Collection Agent to recover usage-specific costs from each of the thousands of entities that use the database,¹² adding a layer of complexity not present with the NANPA/PA functions.

By presupposing that cost and operational efficiencies can be achieved from a single administrator, the Commission unnecessarily hampers its ability to evaluate all options and, potentially, reduces the number of bidders for the RND. Moreover, such a decision would limit the NANC’s ability to offer suggestions for “the most cost-effective way of administering the database.”¹³ In particular, the Commission effectively closes the door to entities, like NetNumber, that are good candidates to serve as the RND Administrator, but either cannot

⁸ *North American Numbering Plan Administrator Annual Report 2018*, NANPA, 11 (2018) https://www.nationalnanpa.com/reports/2018_NANPA_Annual_Report.pdf.

⁹ *Id.* at 35.

¹⁰ *Id.* at 4.

¹¹ *Id.* at 16.

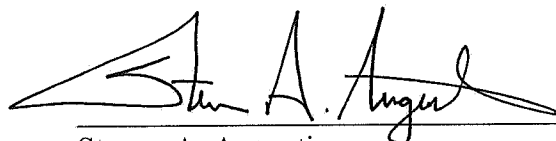
¹² *RND Order*, ¶ 46.

¹³ *Id.*, ¶ 60.

perform the functions of the NANPA or PA or do not wish to build the capabilities to do so. Thus, NetNumber and entities similarly positioned to it may decline to bid on the RND Administrator contract, which may result in increased costs of the database and limit the technical capabilities of the RND.

NetNumber recommends that the Commission ensure it benefits from the capabilities of all potential providers of the RND and that it frees the NANC to provide recommendations that best maximize efficiencies in the RND. For these reasons, the Commission should disclaim the statements made in paragraph 34 and consider all options for providing the RND, NANPA, and PA functions.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steven A. Augustino", written over a horizontal line.

Steven A. Augustino
Chris M. Laughlin
Kelley Drye & Warren LLP
3050 K Street, NW, Suite 400
Washington, D.C. 20007
(202) 342-8400
SAugustino@kelleydrye.com

Counsel to NetNumber, Inc.

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